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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) MM Docket No. 93-259
)
Amendment of Section 73.202(b),) RM-8341
Table of Allotments,)
FM Broadcast Stations)
(Earle, Arkansas))

To: Chief, Allocations Branch

**REPLY COMMENTS OF
BROADCASTERS & PUBLISHERS, INC.**

Broadcasters & Publishers, Inc. ("BPI"), licensee of station WWKZ(FM), Channel 278C, New Albany, Mississippi, by its attorneys and pursuant to Section 1.420 of the Commission's rules, hereby submits its reply comments in response to the Notice of Proposed Rule Making released by the Commission in this proceeding on September 30, 1993 ("Notice").

Pursuant to the Notice, BPI filed comments and a counterproposal, and Earle Broadcasting ("EB"), the petitioner, filed comments. EB proposes the allotment of Channel 234C3 to Earle, Arkansas. In its comments, EB incorporates by reference its Petition for Rule Making, filed August 26, 1993, and restates its intention to apply for Channel 234C3 if it is allotted and to build a station, if it is authorized.

BPI proposes that Channel 278C be allotted to Como, Mississippi, as that community's first local service, in substitution for Channel 278C at New Albany, Mississippi, and that BPI's community of license be modified accordingly. In

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order to accommodate its request, BPI further proposes that Channel 234A be substituted for Channel 279A at Wilson, Arkansas. Channel 234A at Wilson, Arkansas, is mutually exclusive with the proposed allotment of Channel 234C3 at Earle. There are two options available which would allow BPI to operate on Channel 278C at Como.

Option 1

Como, Mississippi

Present
None

Proposed
278C

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
None

Option 2

Como, Mississippi

Present
None

Proposed
278C

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
234C3 or 280C3

Pocahontas, Arkansas

Present
280A

Proposed
281A

As demonstrated in BPI's comments, both options are preferred over EB's proposal. Under Option 1, BPI will provide service to 1,050,536 people in an area of 21,479.2 square kilometers. This represents service to 719,279 more people than BPI serves from its existing facilities at New Albany. EB proposes service to 81,491 people in an area of 4,794 square kilometers. New Albany will retain a full-time AM station, WNAU, 1470 KHz, and an FM station, WWZD, Channel 294C2. In addition, WWKZ(FM) would still provide city grade service to New Albany from its proposed reference site at Como.

Under Option 2, both Earle and Como will receive first local service, and KPOC-FM, licensee of Channel 280A at Pocahontas, Arkansas, would be able to operate as a 6 kilowatt Class A facility on Channel 281A from its present site, enabling the station to increase its population coverage from 13,195 people to 17,639 people. Accordingly, BPI's counterproposal would best serve the public interest and should be granted. In the event

that the Commission approves either of the foregoing options, BPI intends to promptly seek the necessary modifications to its license and construct the necessary facilities to serve Como.

IN VIEW OF THE FOREGOING, BPI respectfully requests that the Commission amend its FM Table of Allotments as proposed in Option 1, or in the alternative, as proposed in Option 2.

Respectfully submitted,

BROADCASTERS AND PUBLISHERS, INC.

By:


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December 3, 1993

CERTIFICATE OF SERVICE

I, Bridget Y. Monroe, a secretary for the law firm Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, do hereby certify that a true and correct copy of the foregoing "Reply Comments of Broadcasters & Publishers, Inc." was mailed first-class, postage prepaid, this 3rd day of December, 1993, to the following:

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